

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

United States of America)

v.)

Jeffery Steward)

Case No. 1:23mj-



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 22, 2023 in the county of Harrison in the
Southern District of MS, Southern Division, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2422(b)

Using a facility and means of interstate and foreign commerce, that is, the internet, did knowingly attempt to entice any individual who has not attained the age of 18 years old, to engage in any sexual activity.

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein by reference.

☒ Continued on the attached sheet.

A handwritten signature in blue ink, appearing to read "Hillary Ladner".

Complainant's signature

Hillary Ladner, Special Agent FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

6/30/2023

A handwritten signature in blue ink, appearing to read "Bradley W. Rath".

Judge's signature

City and state:

Gulfport, Mississippi

Bradley W. Rath, United States Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF MISSISSIPPI
SOUTHERN DISTRICT OF MISSISSIPPI

I, Hillary Ladner, being first duly sworn, hereby depose and state as follows:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since April 2021. I primarily investigate federal crimes related to the sexual exploitation and sexual abuse of children. I have gained experience through training in seminars, classes, and everyday work related to conducting these types of investigations. I have been involved in numerous investigations involving violent crimes against children, child exploitation, the production of child sex abuse materials and human trafficking, to include leading investigations related to internet crimes involving children, writing and executing search warrants, interviewing victims, interviewing suspects, and conducting arrests. I am authorized to investigate violations of laws of the United States with authority to execute warrants issued under the authority of the United States.
2. This Affidavit is made in support of an application for an Arrest Warrant authorizing the arrest of Jeffery STEWARD for violations of Title 18, United States Code, Section 2422(b).
3. I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are necessary to establish probable cause to believe that STEWARD knowingly attempted to entice a person under 18 years old to engage in sexual activity for which any person can be charged with a criminal offense by use of any facility or means of interstate commerce in violation of Title 18, United States Code, Section 2422 (b).
4. Title 18, United States Code, Section 2422(b) makes it a crime for anyone using the mail or any facility or means of interstate or foreign commerce, to knowingly attempt to entice a person under 18 years old to engage in sexual activity for which any person can be charged with a criminal offense.
5. On June 22, 2023, the Philippine National Police, Mindanao Field Unit (MFU), contacted the Federal Bureau of Investigations (FBI) Legal Attaché (LEGAT) office in Manila, Philippines regarding a possible US based traveler, identified as Jeffery Allen STEWARD.
6. MFU recently rescued a minor female victim who disclosed she had been communicating with STEWARD online via Facebook. STEWARD sent the minor victim adult sexually explicit material and a link to an adult site. The minor victim sent STEWARD sexually explicit material of herself; however, she has since deleted the sexually explicit content she sent.

7. On July 23, 2023, the FBI LEGAT office received an e-mail with financial transactions from STEWARD to the minor victim's mother dated 9/29/2022, in the amount of 15,000.18 Philippine Pesos. There was another receipt dated 3/8/2023 showing a financial transaction STEWARD sent to the minor victims mother in the amount of \$202.00 USD.
8. STEWARD paid the victims' mother as well as sent the minor victim gifts such as promise rings and necklaces in return for sexually explicit material from the minor victim as well as live video chats with the minor victim. Highlights of the messages STEWARD sent the minor victim discussing the gifts is below:
 1. February 6- STEWARD: heyyyyyy brat r u forgetting something.....i got u A LOT if gifts that will be there for Valentine's day brat lol.....u got more gifts than all ur gf's put together lol hust don't brag it to anyone or post it okkkk....my wife still stalking ur fb I'm sure she has more fake accounts and she will always be looking for the emerald ring and necklace and the pearl/diamond promise ring and if she knows u got balikbayan box she will make trouble again so just keep it secret all the things i got u ok sweetheart
 2. February 20-STEWARD: well maybe if u do tye 3 things I want u to do, and do it very very good for me, then maybe i will buy u new cp again baby.....BUT u have to do the 3 things first.....make video playing and using headset so i can hear u moaning softly and saying my name and talking mallkot to me until ur juices coming out.....and then when ur pussy so wet dripping ur cum take nice pictures.....and play mallkot on vc with me this week and chat me couple hours at 12pm sharp.....then i we can talk about me getting u new cp BUT u must do all 3 things first and do them very good ok mahal ki????
9. On February 15, the minor victim sent STEWARD an image of the necklace she received from him. The image is below:



10. Additionally, STEWARD sent a photo of an airline ticket indicating he would be flying to Manila, Philippines on July 5 and flying back to the United States on August 2.
11. STEWARDS wife and the minor victim's parents know one another from the province they are from.
12. Based on the aforementioned facts and circumstances, your affiant believes there is probable cause that Jeffery STEWARD is in violation of 18 USC 2422(b), because the defendant did use a facility or means of interstate or foreign commerce to knowingly attempt to entice any individual who has not attained the age of 18 years old, to engage in any sexual activity for which the person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422 (b).
13. Based on the foregoing, your affiant respectfully requests an arrest warrant be issued for Jeffery STEWARD.

Respectfully submitted,



Hillary Ladner

Special Agent

Federal Bureau of Investigations

Subscribed and sworn before me
this the 30th of June 2023.



United States Magistrate Judge